



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ABK/EDP
F. #2014R00236

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 24, 2015

By Federal Express

James Michael Roth, Esq.
Stampur & Roth
299 Broadway, Suite 800
New York, NY 10007

Re: United States v. Jun Feng, et al.
Criminal Docket No. 14-387 (MKB)

Dear Mr. Roth:

The government hereby produces discovery with respect to this case, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and provides disclosures in advance of trial, pursuant to 18 U.S.C. § 3500. This letter supplements the government's disclosures to date.

I. Supplemental Discovery

Enclosed herewith is a compact disc containing the following items: (i) photographs taken during the June 11, 2014 search warrant executed at the defendant's residence, Bates-numbered GOV-JUNFENG-04836 – 43; (ii) copies of bank, debit and PBA cards recovered from the defendant's wallet during the search of his residence, Bates-numbered GOV-JUNFENG-04844 – 45; and (iii) photographs of non-drug evidence recovered during the search of the defendant's residence, Bates-numbered GOV-JUNFENG-04846 – 59. You may examine the physical evidence discoverable under Rule 16, including original documents, by calling the undersigned to arrange a mutually-convenient time.

Additionally, the enclosed compact disc contains folders labeled "N-33 Audio (02-27-14)" and "N-43 Audio (04-17-14)," which contain body-wire recordings from meetings between an undercover law enforcement agent and the defendant's co-conspirators that took place on February 27, 2014 and April 17, 2014, respectively. The defendant does not appear on these recordings. The recorded meetings and surrounding events are described

in the Complaint and accompanying redacted reports of investigation.¹ Any translations relied upon by the government will be produced as they become available.

II. Early Disclosures under 18 U.S.C. § 3500

Enclosed are two compact discs, Bates-numbered 3500-BY-1A and 3500-BY-1B, which contain body-wire recordings that the government does not intend to offer in its case-in-chief at trial. The defendant does not appear on these recordings. The recorded meetings and surrounding events are described in the wiretap applications previously disclosed by the government on September 4, 2014, as well as in the accompanying redacted reports of investigation. These recordings are provided to the defendant as part of the government's early Section 3500 disclosures to avoid unnecessary delays at trial.

Very truly yours,

KELLY T. CURRIE
Acting United States Attorney

By: /s/ Erik D. Paulsen
Erik D. Paulsen
Ameet B. Kabrawala
Assistant U.S. Attorneys
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Enclosures

cc: The Honorable Margo K. Brodie (by ECF) (w/o encl.)

¹ The February 27, 2014 meeting is also described in the March 20, 2014 wiretap application, Bates numbered GOV-JUNFEN-04916 - GOV-JUNFEN-05006, previously disclosed under cover of letter dated September 4, 2014.